

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

JUDY JIEN, et al.,

Plaintiffs,

v.

PERDUE FARMS, INC., et al.,

Defendants.

C.A. No. 1:19-CV-2521-SAG

**JOINT INTERIM MOTION FOR
LEAVE TO FILE UNDER SEAL JOINT
LETTER ON CUSTODIANS AND
OBJECTIONS TO RULE 34
REQUESTS AND EXHIBITS**

Pursuant to Local Rules 104.13 and 105.11 and Paragraph 10 of the Stipulated Protective and Clawback Order in place in this case, *see* ECF No. 450, Plaintiffs and Defendants (collectively, the “Parties”) hereby move the Court for leave to file under seal an unredacted version of the Joint Letter on Custodians and Objections to Rule 34 Requests, as well as the following Exhibits accompanying that letter: PX005, PX006, PX007, PX008, PX010, and PX011. The referenced exhibits were produced by the Parties in the context of this litigation and were designated by the producing party as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” pursuant to the Stipulated Protective and Clawback Order. *See id.* The Joint Letter discusses and summarizes those exhibits. Under the Protective Order, “any Protected Material (or any pleading, motion, or memorandum disclosing them) . . . or any portion thereof which discloses Protected Material, shall be filed under seal,” “[e]ven if the filing party believes that the materials subject to the Order are not properly classified as Protected Material.” *Id.* The Parties request permission to file these documents under seal in accordance with that order to maintain the confidentiality requested by the producing parties. The Parties will also file a separate copy of the Joint Letter incorporating more tailored redactions of the passages in the letter that disclose Protected Material within 14 days of the filing of this motion.

For the foregoing reasons, the Parties request that permission to file these documents under seal be granted.

Dated: August 19, 2021

Respectfully submitted,

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I hereby certify that on August 19, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice to counsel for all parties that have appeared in this case.

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